



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES
The Director-General

Brussels
MARE/D3-D1/PCO-CGO/Ares (2020)

Mr Giampolo Buonfiglio
Chairman
MEDAC
c/o Ministero delle Politiche
Agricole, Alimentari, Forestali e del
Turismo
Via XX Settembre, 20
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ITALY
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Subject: Reply on Adriatic small pelagics (268 /2020)

Dear Mr Buonfiglio,

I would like to thank you for your extensive additional reply (268 /2020) to my requests for further clarifications.

We had no intention to pose strictly scientific questions to MEDAC, but rather to raise questions in order to understand better the underlying mechanisms to your proposal for the management of the small pelagic stocks in the context of a combined effort regime for the two species. I appreciate that you consulted scientific experts. However I am surprised by the fact that you did not take their feedback into account, in particular in light of the most updated scientific results.

The GFCM benchmark meeting, which includes 2019 data and lasted over two years, just came to rather worrying conclusions. Both anchovy and sardine are still subject to a high overexploitation and, in particular, the fishing mortality of sardine in 2019 is the highest on record. Even worse, the biomass of both stocks is very close to the point where the reproductive capacity of the stocks could start being impaired. This is not the outcome I was hoping for after years of emergency measures adopted at GFCM level (Rec. GFCM/42/2018/8). This is also a clear sign of the inadequacy of these measures to halt the stocks from further deteriorating.

The scientist consulted by MEDAC argued that with a combined species management, it is impossible to manage the individual stock fishing mortality and thus to ensure their long term sustainability. In addition, it has been argued that due to the schooling behaviour of small pelagics, a management based on effort is risky and that around the world these stocks are managed through catch control. In other words, the scientists do

not consider your proposed approach as sustainable. This is confirmed by the latest GFCM scientific advice.

Therefore, further extending the current emergency measures as they are, would not guarantee a sustainable exploitation of the stocks. This would not be in line with the basic principles of the CFP and the MedFish4Ever commitments. This simply is not a viable option.

I take note that you acknowledge that measures 2, 3, 4, 5 could be made more restrictive and I welcome the openness of the sector to additional measures to reduce fishing effort, but I note that the measure of a catch limitation, which is currently part of GFCM/42/2018/8, is not mentioned. I welcome the acknowledgement of the advantages of TAC/quota system and agree that a level playing field has already been established in the Adriatic Sea with the GFCM decisions in place, which could be further fortified in a new plan.

Let me stress that an agreement on catch allocation between Adriatic countries is a key step for the implementation of a meaningful management of the stocks. This has also been put forward as a need of the sector in a joint statement from the Croatian and Italian associations¹ to Commissioner Sinkevičius. I stand ready to facilitate this process.

Let me thank you for your commitment. I'm looking forward to our continued cooperation and to MEDAC's support to improve the state of the small pelagics in the Adriatic Sea. I invite you to take contact with Ms Pascale Colson, coordinator of the ACs (Pascale.Colson@ec.europa.eu; +32 2 29 56273), should you have any question on this reply.

Yours sincerely,

Charlina VITCHEVA
Director-General

¹ Ares(2020)6922112